

Approved, SCAO

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2nd copy - Plaintiff
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STATE OF MICHIGAN
JUDICIAL DISTRICT
JUDICIAL CIRCUIT
COUNTY PROBATE

SUMMONS

CASE NO. 2466 - (1)

Court address **180 Ottawa Avenue NW**
Grand Rapids, MI 49503

Court telephone no.

Plaintiff's name(s), address(es), and telephone no(s).

Alonda L. Morgan
641 Russwood St NE
Grand Rapids, MI 49505

Defendant's name(s), address(es), and telephone no(s).

GEO Group Inc. Northlake Correctional
4955 Technology Way (D/B/A) Facility
Boca Raton, FL 33431

Plaintiff's attorney, bar no., address, and telephone no.

JOSEPH ROSSI
(P-53941)

Bureau of Prison
320 First Street NW
Washington, DC 20534

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☒ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____.

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date MAR 18 2021	Expiration date* JUN 17 2021	Court clerk LISA POSTHUMUS LYONS
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*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

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Original - Court
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3rd copy - ReturnSTATE OF MICHIGAN
JUDICIAL DISTRICT
JUDICIAL CIRCUIT
COUNTY PROBATECOMPLAINT
Page 1 of 14 pages

CASE NO.

21 02466 - CD

Court address

Court telephone no.

180 Ottawa Avenue NW
Grand Rapids, MI 49503

Plaintiff's name (s), address (es), and telephone no (s).

Alonda L. Morgan
641 Russwood St. NE.
Grand Rapids, MI 49505
(340) 244-8494
ms.morgan_awomaninchrist@yahoo.com
Plaintiff, in Proper Person

Plaintiff's attorney, bar no., address, and telephone no.

Plaintiff's name (s), address (es), and telephone no (s).

Geo Group Inc. 4955 Technology Way Boca Raton, FL 3341 (561) 893-0101	(D\B\A)	Northlake Correctional Facility 1805 W. 32nd. St. Baldwin, MI 49304 (231) 876-4914
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Bureau of Prison
320 First Street NW
Washington, DC 20534
(202) 307- 319817th CIRCUIT COURT
KENT COUNTY, MICHIGAN

Alonda Morgan,

Plaintiff,

Vs.

Geo Group, INC. D\B\A Northlake Correctional Facility;
Bureau of Prisons;
DOES I through X, inclusive, and ROE
Business Entities I through X, inclusive,

Defendants,

3.18.21
DateAlonda L Morgan
Signature

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Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	COMPLAINT Page <u>2</u> of <u>14</u> pages	CASE NO.
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Plaintiff's attorney, bar no., address, and telephone no.		

COMPLAINT

Plaintiff, Alonda Morgan, in proper person, complains against Defendants, Geo Group, INC.; Bureau of Prisons; DOES I through X, inclusive; and ROE Business Entities I through X. inclusive, as follows:

I. PARTIES

1. Plaintiff, Alonda Morgan, (hereinafter "Plaintiff"), is an individual who is currently, and was at all relent time herein, a resident of the State of Michigan, County of Mecosta, City of Big Rapids.

2. Defendant, Geo Group, Inc. D\B\A Northlake Correctional Facility; (hereinafter "Geo Group"), is a corporation organized and existing by virtue of the laws of the State of Michigan, and may be served with process by service upon its registered agent, _____ if one has or at the above address.

3. Bureau of Prisons (hereinafter "Geo Group"), is a corporation organized and existing by virtue of the laws of the State of Michigan, and may be served with process by service upon its registered agent, _____ if one has or at the above address.

3.18.21
Date

Alonda L Morgan
Signature

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3rd copy - Return

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4. All of the acts and or failures to act alleged herein were duly performed by and/or are attributable to defendants, individually or acting by and through their agents and employees. Said acts/or failures to act were with the scope of any agency or employment, or were ratified by the defendants.
5. The names and capacities, whether individual, corporate, associate or otherwise, of defendants sued herein as DOES I through X, and ROE Business Entities I through X, inclusive, are presently unknown, and Plaintiff will amend this complaint to insert the name (s) when ascertained.

II. FACTS

6. Plaintiff is the owner of 5567 S. WHALEN LAKE DRIVE BALDWIN, MI property and education instructor at Northlake Correctional Facility.
 Defendant (s), s Geo Group Inc. and Bureau of Prisons is the corporation and client, located at 1805 W. 32nd. Street, Baldwin, MI 49304.

3.18.21
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3rd copy - Return

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 Alonda L. Morgan
 641 Russwood St NE
 Grand Rapids, MI 49505

Plaintiff's attorney, bar no., address, and telephone no.

Defendant's name(s), address(es), and telephone no(s).

 GEO Group Inc. Northlake Correctional
 4955 Technology Way (D/B/A) Facility
 Boca Raton, FL 33431

 +
 Bureau of Prison
 320 First Street NW
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7. Problems within Northlake Correctional Facility first became apparent to me on February 2/21/20 between 3:30pm -4:30pm. This is when I saw the Chief of Security Stephan Castiglione on the ground looking towards me on my way out the facility. I was frightened and someone was there with him, so I just prayed and continued out the door home.
8. Again on 3/6/20 Amanda Floyd (Director of Case Management), started yelling in her office and I truly believe that it was directed towards me, but I never had any contact with her. I did not go to the back to the back room by myself again until around 4/15/20. There were two people in the back Gat and Floyd nobody moved, then suddenly somebody came from the office as if maybe coming after me and I ran out of the office not to go back there by myself.
9. On 3/9/20 Amanda Floyed and Kory Kusick (Assistant Facility Administrator), stood at the ODR door as to what I now realize as an act of intimidation towards me between 7:45am-8:00 am;
10. The day that I felt that a criminal act was truly done to me was on March 17, 2020. I the Plaintiff spoke with the director of education between the hours of 12:30-1pm about how I was left in the cafeteria by myself with the inmates and their behavior seemed malicious and unusual towards me. During class I had experience the same thing only this time my students started to act like they did not understand English.

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3rd copy - Return

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11. At that March 20, 2021 meeting with the Education Director and discussion with her my concern she did not offer any help or solutions on what to do about my concern she just sat there.
12. The Plaintiff did not return to work for three days because of fear.
13. The Plaintiff, returned to work On 3/26/20 Robin Cross (Health Service Administrator) waited until a group of employees came in and started saying loudly how some people should be glad to have a job. I believe this is the very day that Ms. Cameron a co-worker that I talked with stopped talking and coming around me.
14. On April 23, 2020 the Plaintiff, was touched by an inmate and a memorandum was written about it. I was never called into the office to discuss the matter. At this point my fear was building and did not ask about it.
15. The Plaintiff, on 5/7/2020 or 5/8/2020 May between hour of 2 and 3pm experienced what I view as an intimidating acting coming from most department heads (including those who may are no longer employed at this particular facility -Kory Kusick (AFA-Operation), Mark Pitcher (Executive Assistant Manager). I was called to come down to the administration part of the building only to find most if not all department heads standing outside their doors or running to be outside as I walked by

5.18.21
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3rd copy - Return

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16. On 5/19/ 2020 the Plaintiff, was suddenly not able to renew my lease after two years and the explanation was that a friend needed a place to stay (beginning of COVID). (Outside Retaliation in Big Rapids, MI)
17. On 6/4/2020 the Plaintiff attended a Mentorship Program Meeting and was over looked as being part of the program. I was not notified or gotten back to in order to participate. I did ask Jenna (Department Head for Training) about it and she the training was already started.
18. On 6/16/2020 director Rush wrote a letter what was supposedly for the department and signed it "all for one and one for all". Which I felt like it was not all inclusive to include me because of what I had been enduring over the last few months.
19. On 6/21/2020 the Plaintiff, rented a trailer from a local tractor supply company to help take the brush from my land to the dump and everything went smoothly. However, on 6/27/2020 when I came to rent the trailer they started making changes they said and a new way they had to do things. That very day as I went to dump my brush the dump yard in my county had placed a wooden log in the middle of the drive path so no one could dump their brush. I have worked on my land and went to the brush yard and they never did anything like this before. (Outside Retaliation in Baldwin, MI)

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Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - ReturnSTATE OF MICHIGAN
JUDICIAL DISTRICT
JUDICIAL CIRCUIT
COUNTY PROBATECOMPLAINT
Page 7 of 14 pages

CASE NO.

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Alonda L. Morgan
641 Russwood St NE
Grand Rapids, MI 49505

Plaintiff's attorney, bar no., address, and telephone no.

Defendant's name(s), address(es), and telephone no(s).

GEO Group Inc. Northlake Correctional
4955 Technology Way (D/B/A) Facility
Boca Raton, FL 33431Bureau of Prison
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20. On 6/28/2020 the Plaintiff, working in the cafeteria the inmate workers started placing the food trays a in the shape of a house. They did not do it before and at one point they wrapped blue wrapping around one of the carts –as to indicate that someone has been following me outside of work and knows the truck color of the worker who has been helping clear my land. (Retaliation/ Psychological Harassment in Baldwin, MI)
21. On 6/29/2020 I the Plaintiff, wrote another memorandum about two co-workers and how I felt like the reason I was being attacked was because of my race. I was being kind by trying to give a wow card to one of them and she refused so I simple said that black lives matter and walked away.
22. On 6/29/2020 around lunch time a group of inmates came in from outdoors as I was pushing carts. I was the only education staff in the hallway. They were whistling and yelling. Not one staff did anything the central control did shut the gate.
23. On June 30, 2020 I received an evaluation from director Rush and she told me that she had been receiving emails about me not talking to people (which she never was able to produce) and it created a hostile atmosphere. I did not sign the evaluation because it was done right false.
24. The months of July-September I the Plaintiff tried to seek help from an attorney and no would call me back although I indicated I felt unsafe. I finally called on back who was referred to me and the person that I spoke with told me that their supervisor told them to block my number. (phone records are available upon request)

Date

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Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

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25. On or around October 10, 2020 I made a report to the EEOC to complain of racial motivated treatment that has been allowed to take place against me by the the above mentioned carried out by those who are in supervisory or leadership positions. I scheduled a interview for the next available time slot which was to take place February 17, 2021 at 1pm (over 4 months later). I called and spoke with a Georgia about ten minutes after I did not receive a call. She said that there had been no attempt documented that any tried to call. I gave my email address and told her to let whoever is supposed to call to email a phone number if they were not able to reach me by phone and I will call them. Furthermore, I noticed that the Bureau of Prisons name was taken off of the complaint and wording was changed in my written statement.
26. On February 18, 2021, the EEOC emailed me and said that they could push through some cases.
27. On or two weeks before July 7, 2020 between the hours of 3:30pm-4:30pm again I saw something happening that look as if it was directed towards me as it pertained the Chief of security Stephan Castiglione. At this point I am just scared and went out the door.
28. On July 13, 2020 I the Plaintiff, went to my land and notice a company cutting some trees in the area. I hired them on the spot with the understanding that the job would be done within the next three days. After a worker received a phone call they hurried up and

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3rd copy - Return

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left not finishing the job until about two weeks later and hey left holes in the yard from the stump removal (Outside Retaliation in Baldwin, MI) (I do have pictures)

29. On 7/23/20 between 3pm-4pm. Inmates were allowed to sexually harass me by whistling and making gawking sounds right down the hall from the Lieutenants office and several of them were in the room and not one of them did anything about it. These were the loud whistles when you place two fingers in your mouth. (Retaliation, Sexual Harassment, Unlawful employment practice in Baldwin, MI)
30. Throughout the months of ending of June until around the mid to end of August the shape of the food trays continued. (Retaliation, Psychological Harassment, in Baldwin, MI)
31. Jamie Grimely (BOP)- **August 18, 2020** between the hours of 3-5pm. As I was walking out to go home and Mr. Grimely, Mr. Bryan BOP, and Dunbar participated in what has always been an intimating ritual (See Angela Dunbar for the continued excerpt). The following day my car was vandalized (I do have pictures)
32. Jeremy Bryan (BOP)- **August 18, 2020** between the hours of 3-5pm. As I was walking out to go home and Mr. Bryan, Mr. Grimely, and Dunbar participated in what has always been an intimating ritual (See Angela Dunbar for the continued excerpt). Additionally, on February 24, 2021 between That day my car was vandalized on the other side in a similar spot in the workplace parking lot-I didn't have my phone, but I did eventually take a picture -however I called the NAACP in distress first in Texas then in Grand rapids right after I left the worksite. I was told that they do not service my area and did I call to vent.

Date

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3rd copy - Return

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33. On the morning Oct 1, 2020 I the Plaintiff gave a memorandum to Warden Tracy Johns about being left in the inmate POD alone as a woman and needing locks for testing material.
34. The response was retaliation in the form of the Defendant Mr. Johns in a confrontational manner giving me in his words, "a direct order" to write out the meaning of SBU. I did write out the meaning and gave it to him only to receive what seemed to be continued retaliation in an unprofessional manner of raising his voice to the point of it causing me to dry heave in the middle of his attack and throwing up in the restroom. The coworker that saw me go into the restroom a week or so later was let go (The second confrontation was about testing material) This took place on 10/14/20 around 11am-Noon.
35. On the morning of 10/14/20 between 11am-Noons I was updating my syllabus only to find that someone had placed on my syllabus the book or statement that said "The ape in the corner office: Understanding the workplace beast in all of us, New York: Crown Business." I was so distraught that I literally could not print the paper to show my director that I had a coworker do it for me. (This is the same coworker that was let go a week or so later).

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Alonda L Morgan
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Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

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Alonda L. Morgan
641 Russwood St NE
Grand Rapids, MI 49505

Plaintiff's attorney, bar no., address, and telephone no.

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GEO Group Inc. Northlake Correctional
4955 Technology Way (D/B/A) Facility
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36. Director Rush 10/14/20 between 11am-Noons was given the paper that a coworker (Tasha Cook) helped print that morning and just asked to have it placed in my work file.
37. On 11/2019 I the Plaintiff *went into* the local Lens Crafters only to receive the wrong prescription from the optometrist. I got so busy with life that I did not have time to go back and fix the issue. On 1/4/21 I again went to get my yearly eye exam from W Optical and the *exam was done remotely*, but my contact exam was done by Kentwood Pearle Vision (not done remotely)- the following week and given a so called glass prescription exam free 1/19/21. The eye glass prescription was similar to the previous year that I noticed something was wrong. However, the remote prescription fit my usual Rx range. (Outside Retaliation in Grand Rapids, MI)
38. On 10/30/20 I the Plaintiff took my car to Firestone because I heard something going on with my tire. Only to have them go under my hood and say something was wrong with my water pump and fan clutch. My car has not sounded right since. (Outside Retaliation in Grand Rapids, MI)
39. On 11/4/20 after coming in and asking questions about the different car alarms and what I was looking for. I purchased an alarm from Micky Shorr only to find that it did nothing that I asked for. A Police report was taken. (Outside Retaliation in Grand Rapids, MI)

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3rd copy - Return

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Plaintiff's attorney, bar no., address, and telephone no.		

III. CLAIMS FOR RELIEF

Plaintiff Alonda Morgan is a respected professional and has spent her life building a positive reputation. Nevertheless, the defendants have defamed her name and character not only in the community where she does her business, but in the town where she decided to make a home for her and her mother. As a result of the Defendant's actions, the Plaintiff is sustaining sleepless nights, loss of work, mental anguish and irrevocable emotional harm, and strain on her and her family and living situation (currently living in a hotel Monday-Friday). Defaming or harming the reputation of the Plaintiff may have caused future customers to do business elsewhere and or even or bring forth doubt from a potential employer whether to hire her (this stress makes a claim for present and future financial harm). I still must work at this facility because of the

outside retaliation of defamation has caused businesses to treat me with unscrupulous service or no service at all. and my living arrangement has changed in a way that has me.

A. Unlawful Employment Practices

Defendant choice to ignore the **Civil Rights act of 1964**, which prohibits employment unlawful acts of discrimination on the basis of race. Being called an ape in the most deceitfully disguised way is abusive and nothing more than a dose of poison to any person's body, mind, and soul.

Defendants **employment practice SEC2000e-5 [Section 706] violation** of not including or denying a woman of color in mentorship trainings or being allowed to hold such position.

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--

Defendants own **Anti-Retaliation Agreement** was breach when they began bullying, harassing, exhibiting deliberate exclusionary behaviors...etc.

Defendants, Defamation of character is a civil wrong and is a malicious act which has caused harm to my current lifestyle and future business endeavors as well as living expectations.

B. Negligence-

Defendants breached their duties as set forth above to maintain reasonable safe and harassment free work environment and without retaliation.

Defendants' breach has caused defamation character to plaintiff and her future business endeavors.

III. PRAYER OF RELIEF

WHEREFORE, Plaintiff prays for the following relief:

- i. For compensatory damages for any holistic medical cost and expenses, for future in excess of -----
- ii. For general damages for past, present and future pain suffering, and other damages in excess of 800,000;
- iii. For such other and further relief as this court deems just and equitable.

5/18/21
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Alonda L. Morgan
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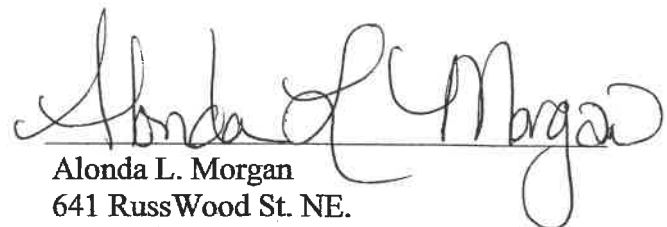
GEO Group Inc. Northlake Correctional
4955 Technology Way (D/B/A) Facility
Boca Raton, FL 33431

v

Bureau of Prison
320 First Street NW
Washington, DC 20534

I declare under penalty of perjury under the law of the State of Michigan that the foregoing is true and correct.

DATED this 18th day of March, 2021.



Alonda L. Morgan
641 Russwood St. NE.
Grand Rapids, MI 49505
(340) 244-8494
ms.morgan_awomaninchrist@yahoo.com
 Plaintiff, in Proper Person

3.18.21
 Date

Alonda L. Morgan
 Signature